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*Attorneys for Defendants Trans Union LLC
and Trans Union Rental Screening
Solutions, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMIT PATEL, on behalf of himself and all
others similarly situated,
Plaintiff(s),

v.

TRANS UNION, LLC, in its own name and
t/a TRANS UNION RENTAL
SCREENING SOLUTIONS, INC. and
TRANSUNION BACKGROUND DATA
SOLUTIONS, and TRANS UNION
RENTAL SCREENING SOLUTIONS,
INC. in its own name and t/a
TRANSUNION BACKGROUND DATA
SOLUTIONS,
Defendants.

Case No. 14-0522-LB

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND NON-EXPERT
DISCOVERY AND EXPERT
DISCLOSURE DEADLINES**

Plaintiff Amit Patel and Defendants Trans Union LLC and Trans Union Rental Screening Solutions, Inc. (collectively, the “Parties”), through their undersigned counsel, hereby jointly request (i) a 28-day extension of the non-expert discovery deadline (for already-served written and oral discovery requests only) until February 17, 2017, and (ii) a 21-day extension of the initial expert disclosure deadline until March 3, 2017. The requested extensions will not affect the other existing deadlines to complete expert discovery and brief dispositive motions, or the Court’s pre-trial and trial schedule. In support of their stipulation, the Parties state as follows:

1. On June 27, 2016, the Court entered a Revised Scheduling Order (ECF 123).

2. Since that time, the Parties briefed and the Court ruled on Defendants’ Motion to Decertify Classes, Plaintiff mailed notice to the certified class and sub-class, and the Parties have diligently engaged in Phase II (i.e., merits) discovery in this matter.

3. The Parties need additional time to respond to already-served written discovery requests and to schedule already-noticed depositions (as well as to continue any related meet-and-confer efforts and file any necessary motions to compel if those efforts are unsuccessful).

4. The Parties have conferred and request a 28-day extension of the non-expert discovery deadline (for already-served written and oral discovery requests only) to February 17, 2017 and a 21-day extension of the initial expert disclosure deadline to March 3, 2017.

<u>Case Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Non-expert discovery completion date	1/20/2017	2/17/2017
Expert disclosures required by Federal Rules of Civil Procedure	2/10/2017	3/3/2017

5. The requested extensions will not affect the other existing deadlines to complete expert discovery and brief dispositive motions, or the Court’s pre-trial and trial schedule.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

REED SMITH LLC

/s/ James A. Francis (by permission)

/s/ Karen A. Braje

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*Attorney for Defendants Trans Union LLC and
Trans Union Rental Screening Solutions, Inc.*

Attorney for Plaintiff

Dated: January 17, 2017

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 18, 2017



Hon. Laurel Beeler

United States Magistrate Judge